



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/FTB
F. #2018R02344

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 18, 2021

By Email and ECF

Marshall L. Miller, Esq.
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New York, NY 10118

Re: United States v. Bryan Cho
Criminal Docket No. 21-040 (AMD)

Dear Counsel:

Enclosed please find additional discovery materials in accordance with Rule 16 of the Federal Rules of Criminal Procedure. These materials are designated as "confidential" and thereby subject to the terms of the protective order entered by the Court earlier today. As discussed, the government expects to make additional productions on a rolling basis. The government also requests reciprocal discovery from the defendant.

Specifically, enclosed please find a zip file containing applications, agent affidavits, search warrants and non-disclosure orders for certain search warrants executed by the government during the course of the investigation. The relevant search warrants along with the corresponding Bates ranges for the documents and materials are detailed below:

Search Warrant	Bates Range
Search warrant affidavit, search warrant and non-disclosure order related to iCloud accounts associated with [REDACTED]@gmail.com, dated 6/02/2020	CHO-000026894 - CHO-000026934

Search Warrant	Bates Range
Search warrant affidavit, search warrants and non-disclosure orders related to email accounts [REDACTED]@hotmail.com and [REDACTED]@gmail.com, dated 6/23/2020	CHO-000026935 - CHO-000026980
Search warrant application, affidavit and search warrants related to Cho's residence, among other premises, dated 8/10/2020	CHO-000026981 - CHO-000027080
Search warrant application, affidavit and search warrant related to Cho's Mercedes, among other premises, dated 8/11/2020	CHO-000027081 - CHO-000027165
Search warrant affidavit, search warrant and non-disclosure order related to the iCloud account associated with [REDACTED]@icloud.com, dated 10/29/2020	CHO-000027166 - CHO-000027214
Search warrant affidavit, search warrant and non-disclosure order related to email account [REDACTED]@gmail.com, dated 12/16/2020	CHO-000027215 - CHO-000027257
Search warrant application, affidavit and search warrant related to devices seized from Cho's residence and Mercedes, dated 1/14/2021	CHO-000027258 - CHO-000027288

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The government hereby reiterates its requests reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, data, photographs, tapes, tangible objects, or copies or portions thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely upon at trial, or that were prepared by a witness whom the defendant intends to call at trial.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
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Enclosures

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)